

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES INVESTOR PROTECTION
CORPORATION,**

Plaintiff-Applicant,

v.

**BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,**

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

**IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC, and Bernard L. Madoff,**

Plaintiff,

v.

FULLERTON CAPITAL PTE LTD.,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 12-01004 (CGM)

STIPULATION AND ORDER

Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.*, and the estate of Bernard L. Madoff, individually, and defendant Fullerton Capital PTE Ltd. (“Defendant”), by and through their respective, undersigned counsel, hereby stipulate and agree as follows:

Defendant shall respond to the Complaint by March 18, 2022. If Defendant files a motion to dismiss the Complaint, such motion shall set forth any and all grounds for

dismissal at the pleading stage. The Trustee shall respond to the motion by May 18, 2022, and Defendant shall file its reply by June 17, 2022.

If Defendant files such a motion to dismiss the Complaint, then the parties shall seek oral argument on the motion at such time as the Court deems proper.

Dated: December 9, 2021
New York, New York

By: /s/ Nicholas J. Cremona
BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com
Robyn M. Feldstein
Email: rfeldstein@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for
the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the Chapter 7
Estate of Bernard L. Madoff*

SO ORDERED.

By: /s/ Kent A. Yalowitz
ARNOLD & PORTER LLP
250 West 55th Street
New York, New York 10019
Telephone: (212) 836-8000
Facsimile: (212) 836-8689
Kent A. Yalowitz
Email: kent.yalowitz@arnoldporter.com
Daniel Bernstein
Email: Daniel.bernstein@arnoldporter.com

*Attorneys for Defendant Fullerton Capital PTE
Ltd.*

**Dated: December 13, 2021
Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris
Chief U.S. Bankruptcy Judge**